IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

CRIMINAL NO.

v.

: DATE FILED:

DEVON LAMONT YOUNG, III

: VIOLATIONS:

21 U.S.C. § 841(a)(1), (b)(1)(B)

: (possession with intent to distribute a

controlled substance - 1 count)

: 18 U.S.C. § 924(c)(1)(A)(i) (possession of

a firearm in furtherance of a drug

trafficking crime - 1 count)

: Notices of forfeiture

<u>INDICTMENT</u>

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about October 15, 2020, in Allentown, in the Eastern District of Pennsylvania, defendant

DEVON LAMONT YOUNG, III,

knowingly and intentionally possessed with the intent to distribute 5 grams or more, that is approximately 20 grams, of methamphetamine, a Schedule II controlled substance; a mixture and substance containing a detectable amount of an analogue of N-phenyl-N- [1-(2-phenylethyl)-4-piperidinyl] propenamide ("fentanyl"), a Schedule I controlled substance; and a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), (b)(1)(C).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 15, 2020, in Allentown, in the Eastern District of Pennsylvania, defendant

DEVON LAMONT YOUNG, III,

knowingly possessed a firearm, that being at least one of the following: a Cobra, FS380, .38 caliber semi-automatic pistol, bearing serial number FS086061, loaded with seven live rounds of ammunition, and a Beretta, 950 BS, .25 caliber semi-automatic pistol, serial number BU55285V, loaded with eight live rounds of ammunition, in furtherance of a drug trafficking crime for which he may be prosecuted in a Court of the United States, that is, possession with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count One of this indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

NOTICE OF FORFEITURE 1

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violation of Title 21, United States Code, Section
 841(a)(1), set forth in this indictment, defendant

DEVON LAMONT YOUNG, III,

shall forfeit to the United States of America:

- (a). any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation, including, but not limited to:
- (1). a Cobra, FS380, .38 caliber semi-automatic pistol, bearing serial number FS086061, loaded with six live rounds of ammunition in the magazine, and one live round of ammunition in the chamber; and
- (2). a Beretta, 950 BS, .25 caliber semi-automatic pistol, serial number BU55285V, loaded with eight live rounds of ammunition in the magazine; and
- (b). any property constituting, or derived from, proceeds obtained directly or indirectly as a result of the commission of such offense.
- 2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:
 - (a). cannot be located upon the exercise of due diligence;
 - (b). has been transferred or sold to, or deposited with, a third party;
 - (c). has been placed beyond the jurisdiction of the Court;
 - (d). has been substantially diminished in value; or
 - (e). has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

NOTICE OF FORFEITURE 2

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 924(c)(1)(A), as set forth in this indictment, defendant

DEVON LAMONT YOUNG, III,

shall forfeit to the United States of America, all firearms and ammunition involved in the commission of these offenses, including, but not limited to:

- a Cobra, FS380, .38 caliber semi-automatic pistol, bearing serial number FS086061, loaded with six live rounds of ammunition in the magazine, and one live round of ammunition in the chamber; and
- a Beretta, 950 BS, .25 caliber semi-automatic pistol, serial number
 BU55285V, loaded with eight live rounds of ammunition in the magazine.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

A TRUE BILL:

GRAND JURY FOREPERSON

JACQUELINE C. ROMERO UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

VS.

DEVON LAMONT YOUNG, III

INDICTMENT

18 U.S.C. § 924(c)(1)(A)(i) (possession of a firearm in furtherance of a drug trafficking crime – 1 count) 21 U.S.C. § 841(a)(1), (b)(1)(B) (possession with intent to distribute a controlled substance – 1 count) Notices of forfeiture

